

1 The Honorable Ricardo S. Martinez
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UNITED STATES DISTRICT COURT

5 WESTERN DISTRICT OF WASHINGTON

6 AT SEATTLE

8 TREVOR KEVIN BAYLIS,

9 Plaintiff,

10 v.

11 VALVE CORPORATION,

12 Defendant.

Case No. 2:23-cv-01653-RSM

PLAINTIFF

TREVOR KEVIN BAYLIS

REQUEST FOR ADMISSION SET 2

13 Filed: 13th February 2024

14 PROPOUNDING PARTY: Trevor Kevin Baylis

15 RESPONDING PARTY: Valve Corporation

16 **REQUEST FOR ADMISSION SET 1**

17 TO ANY DEFENDANT AND COUNSEL OF RECORD:

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19 Pursuant to Federal Rules of Civil Procedure 36. It is hereby requested and
20 demanded of Defendant “Valve” that Valve make admission of following statements of
21 facts which are of material significance to the case at hand, Baylis v Valve Corporation,
22 in accordance to rule 36 of the Federal Rules of Civil Procedure under which this
23 request is made, to answer the following facts, and that such answers be sworn and filed
24 in the office of the District Court Clerk where this case is pending, and file an answer to

1 the author of this request in writing, 30 days of serving this request upon Valve. Or else,
2 each of the matters within this request for admission, shall and must be admitted by
3 Valve in accordance to rule 36 of the Federal Rules of Civil Procedure.

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5 **1. REQUEST FOR ADMISSION TRUTH OF FACTS**

6 Admit that the following facts are true:

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8 **REQUEST FOR ADMISSION NUMBER 1.**

9 1. Admit that in the case at hand, “Baylis v Valve Corporation”, Valve cannot
10 present any written and signed license or any other written and signed agreement from
11 Plaintiff “Baylis”, either directly or through any Chain of Title documentation that
12 allows Valve to, store, display, distribute, sell, adapt, license or sub-license any of
13 Baylis’ copyrighted works, or works that he has a joint copyright interest to, such as the
14 film Iron Sky including his 3D animated sequences and 3D models, including adapted
15 models, associated with the film Iron Sky, via any means including but not limited to by
16 Internet transmission, Sale, Streaming or any other Public Performance.

17 **REQUEST FOR ADMISSION NUMBER 2.**

18 2. Valve admit that the film Iron Sky is a “Berne Convention work” that was first
19 published by consent of all authors to a paying public on 11th February 2012 at the Berlin
20 Film Festival in Berlin, Germany.

21 **REQUEST FOR ADMISSION NUMBER 3.**

22 3. Valve admit that the “Country of Origin” for the film Iron Sky is Germany
23 under Berne Convention article 5 (4) (a).

1 **REQUEST FOR ADMISSION NUMBER 4.**

2 4. Valve admit that under the Berne Convention Article 5 (2) there is a
3 “no formalities” rule for the enjoyment and exercise of Baylis’ copyrighted works and
4 therefore, Baylis does not need a “court order” or any other formality to seek to protect his
5 copyrighted works in any country that is a signatory of the Berne Convention.

6 **REQUEST FOR ADMISSION NUMBER 5.**

7 5. Valve admit that under the Berne Convention Article 6bis Baylis has the right
8 to claim authorship of his works even in the event of a transfer of economic rights.

9 **REQUEST FOR ADMISSION NUMBER 7.**

10 7. Valve admit that under the Berne Convention Article 15 (1) Baylis is
11 protected by the Berne Convention due to the fact his name appears on the work, the film
12 Iron Sky, as well as in meta data of numerous original 3D files from which the film Iron
13 Sky is derived from, and he can institute infringement proceedings to protect his work
14 related to Iron Sky in all Berne Union nations.

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16 This “Request for Admission Set 2” is made Pursuant to Federal Rules of Civil Procedure 36.

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20 13th February 2024

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23 Trevor Kevin Baylis
Jankanraitti, Tampere 33560, FINLAND

24 Please note: Plaintiff is dyslexic. Thus written documents such as this may have minor accidental spelling and or
grammatical errors. Such things should not be seen as cause to prejudice the author of this document.

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2 CERTIFICATE OF SERVICE FORM

3 FOR ELECTRONIC FILINGS

4 I hereby certify that on 13th February 2024 I electronically filed the foregoing document

5 with the United States District Court

6 Western District of Washington at Seattle by using the

7 CM/ECF system. I certify that the following parties or their counsel of

8 record are registered as ECF Filers and that they will be served by the

9 CM/ECF system:

10 Jeremy E Roller: jroller@aretelaw.com,

11 jfischer@aretelaw.com,

12 kgreenberg@aretelaw.com

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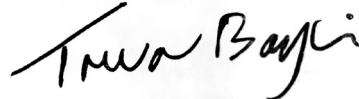
14 Jonah O. Harrison: jharrison@aretelaw.com,

15 jfischer@aretelaw.com,

16 kgreenberg@aretelaw.com

17

18 Dated: 13th February 2024

19 

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21 Trevor Kevin Baylis

22 Jankanraitti

23 Tampere 33560, FINLAND